

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Greenville County  
Edward W. Miller, Circuit Court Judge

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RECEIVED

DEC 21 2015

S.C. Supreme Court

MARSHALL MCGAHA,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001464

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX

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Counsel for Marshall McGaha respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Marshall McGaha respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

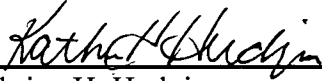
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tremaine Wray v. State with the Supreme Court today. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darrin Holston v. State with the Supreme Court today. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jason Thomas Boston with the Court of Appeals on December 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey Moore v. State with the Supreme Court on December 7, 2015. Counsel filed the petition for rehearing in the case of State v. Gary R. Thompson with the Court of Appeals on December 3, 2015. Counsel presented an oral argument in the Supreme Court in the case of State v. Julio A. Hunsberger on December 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Gardner with the Court of Appeals on November 18, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request.

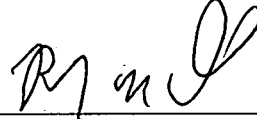
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Kathrine H. Hudgins  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

Attorney for Petitioner

December 21, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Greenville County  
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MARSHALL MCGAHA,

PETITIONER,

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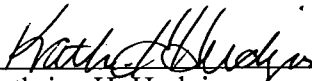
RESPONDENT

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CERTIFICATE OF SERVICE

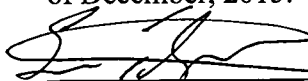
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I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Karen C. Ratigan, Esquire, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 21st day of December, 2015.

  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 21st day  
of December, 2015.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: October 30, 2022.